

MCNAIR LAW FIRM, P.A.

ATTORNEYS AND COUNSELORS AT LAW

Margaret M. Fox
pfox@mcnair.net

www.mcnair.net

THE TOWER AT 1301 GERVAIS
1301 GERVAIS STREET, 11th FLOOR
COLUMBIA, SOUTH CAROLINA 29201

POST OFFICE BOX 11390
COLUMBIA, SOUTH CAROLINA 29211
TELEPHONE (803)799-9800
FACSIMILE (803)753-3219

October 22, 2008

Mr. Charles L. A. Terreni
Chief Clerk and Administrator
South Carolina Public Service Commission
Synergy Business Park, The Saluda Building
101 Executive Center Drive
Columbia, South Carolina 29210

**Re: Application of Time Warner Cable Information Services
(South Carolina), LLC, d/b/a Time Warner Cable to Amend
its Certificate of Public Convenience and Necessity to Provide
Telephone Services in the Service Area of Farmers Telephone
Cooperative, Inc.; Fort Mill Telephone Company, d/b/a
Comporium Communications; Home Telephone Company, Inc.;
PBT Telecom, Inc.; Rock Hill Telephone Company, d/b/a
Comporium Communications; and St. Stephen Telephone Company,
and for Alternative Regulation
Docket Nos. 2008-325-C; 2008-326-C; 2008-327-C; 2008-328-C;
2008-329-C; and 2008-330-C**

Dear Mr. Terreni:

Enclosed for filing on behalf of the above-named telephone companies, please find a Motion to Consolidate in the above-referenced dockets. By copy of this letter and certificate of service, a copy of this Motion is being served on all parties of record.

Thank you for your assistance.

Very truly yours,



Margaret M. Fox

MMF/rwm
Enclosure

cc: Parties of Record

STATE OF SOUTH CAROLINA

(Caption of Case)

App. of Time Warner Cable Information Services to
Amend its Certificate of Public Convenience and
Necessity to Provide Telephone Services in the
Service Area of Farmers Telephone Cooperative,
Inc., and for Alternative Regulation

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2008 - 325 - C

(Please type or print)

Submitted by: Margaret M. FoxSC Bar Number: 65418Address: McNair Law Firm, P. A.Telephone: 803-799-9800P. O. Box 11390Fax: 803-753-3219Columbia, SC 29211

Other: _____

Email: pfox@mcnair.net

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other: _____**INDUSTRY** (Check one)**NATURE OF ACTION** (Check all that apply)

- | | | | |
|--|--|--|--|
| <input type="checkbox"/> Electric | <input type="checkbox"/> Affidavit | <input type="checkbox"/> Letter | <input type="checkbox"/> Request |
| <input type="checkbox"/> Electric/Gas | <input type="checkbox"/> Agreement | <input type="checkbox"/> Memorandum | <input type="checkbox"/> Request for Certification |
| <input type="checkbox"/> Electric/Telecommunications | <input type="checkbox"/> Answer | <input checked="" type="checkbox"/> Motion | <input type="checkbox"/> Request for Investigation |
| <input type="checkbox"/> Electric/Water | <input type="checkbox"/> Appellate Review | <input type="checkbox"/> Objection | <input type="checkbox"/> Resale Agreement |
| <input type="checkbox"/> Electric/Water/Telecom. | <input type="checkbox"/> Application | <input type="checkbox"/> Petition | <input type="checkbox"/> Resale Amendment |
| <input type="checkbox"/> Electric/Water/Sewer | <input type="checkbox"/> Brief | <input type="checkbox"/> Petition for Reconsideration | <input type="checkbox"/> Reservation Letter |
| <input type="checkbox"/> Gas | <input type="checkbox"/> Certificate | <input type="checkbox"/> Petition for Rulemaking | <input type="checkbox"/> Response |
| <input type="checkbox"/> Railroad | <input type="checkbox"/> Comments | <input type="checkbox"/> Petition for Rule to Show Cause | <input type="checkbox"/> Response to Discovery |
| <input type="checkbox"/> Sewer | <input type="checkbox"/> Complaint | <input type="checkbox"/> Petition to Intervene | <input type="checkbox"/> Return to Petition |
| <input checked="" type="checkbox"/> Telecommunications | <input type="checkbox"/> Consent Order | <input type="checkbox"/> Petition to Intervene Out of Time | <input type="checkbox"/> Stipulation |
| <input type="checkbox"/> Transportation | <input type="checkbox"/> Discovery | <input type="checkbox"/> Prefiled Testimony | <input type="checkbox"/> Subpoena |
| <input type="checkbox"/> Water | <input type="checkbox"/> Exhibit | <input type="checkbox"/> Promotion | <input type="checkbox"/> Tariff |
| <input type="checkbox"/> Water/Sewer | <input type="checkbox"/> Expedited Consideration | <input type="checkbox"/> Proposed Order | <input type="checkbox"/> Other: |
| <input type="checkbox"/> Administrative Matter | <input type="checkbox"/> Interconnection Agreement | <input type="checkbox"/> Protest | |
| <input type="checkbox"/> Other: | <input type="checkbox"/> Interconnection Amendment | <input type="checkbox"/> Publisher's Affidavit | |
| | <input type="checkbox"/> Late-Filed Exhibit | <input type="checkbox"/> Report | |

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

Docket Nos. 2008-325-C, 2008-326-C, 2008-327-C, 2008-328-C,
2008-329-C, and 2008-330-C

IN RE: Application of Time Warner Cable Information)
 Services (South Carolina), LLC, d/b/a Time)
 Warner Cable to Amend its Certificate of Public)
 Convenience and Necessity to Provide)
 Telephone Services in the Service Area of)
 Farmers Telephone Cooperative, Inc. and for)
 Alternative Regulation)
 (Docket No. 2008-325-C))
 _____)

IN RE: Application of Time Warner Cable Information)
 Services (South Carolina), LLC, d/b/a Time)
 Warner Cable to Amend its Certificate of Public)
 Convenience and Necessity to Provide)
 Telephone Services in the Service Area of)
 Fort Mill Telephone Company, d/b/a Comporium)
 Communications, and for Alternative Regulation)
 (Docket No. 2008-326-C))
 _____)

IN RE: Application of Time Warner Cable Information)
 Services (South Carolina), LLC, d/b/a Time)
 Warner Cable to Amend its Certificate of Public)
 Convenience and Necessity to Provide)
 Telephone Services in the Service Area of)
 Home Telephone Company, Inc., and for)
 Alternative Regulation)
 (Docket No. 2008-327-C))
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IN RE: Application of Time Warner Cable Information)
 Services (South Carolina), LLC, d/b/a Time)
 Warner Cable to Amend its Certificate of Public)
 Convenience and Necessity to Provide)
 Telephone Services in the Service Area of)
 PBT Telecom, Inc. and for Alternative Regulation)
 (Docket No. 2008-328-C))
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IN RE: Application of Time Warner Cable Information)
 Services (South Carolina), LLC, d/b/a Time)
 Warner Cable to Amend its Certificate of Public)
 Convenience and Necessity to Provide)
 Telephone Services in the Service Area of)
 Rock Hill Telephone Company, d/b/a Comporium)
 Communications, and for Alternative Regulation)
 (Docket No. 2008-329-C))
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IN RE: Application of Time Warner Cable Information)
 Services (South Carolina), LLC, d/b/a Time)
 Warner Cable to Amend its Certificate of Public)
 Convenience and Necessity to Provide)
 Telephone Services in the Service Area of)
 St. Stephen Telephone Company, Inc. and for)
 Alternative Regulation)
 (Docket No. 2008-330-C))
_____)

MOTION TO CONSOLIDATE

Farmers Telephone Cooperative, Inc., Fort Mill Telephone Company, d/b/a Comporium Communications, Home Telephone Company, Inc., PBT Telecom, Inc., Rock Hill Telephone Company, d/b/a Comporium Communications, and St. Stephen Telephone Company, Inc. (collectively, the rural local exchange companies or "RLECs"), hereby respectfully request, that the Public Service Commission of South Carolina ("Commission")

consolidate the above-referenced proceedings. This request is made pursuant to Commission Rule 103-840, for the reasons stated below.

1. On August 22, 2008, Time Warner Cable Information Services (South Carolina), LLC ("TWCIS") filed applications in each of the above-referenced matters. Each of the RLECs intervened in the proceeding dealing with its individual service area.

2. The respective applications in the six proceedings are in all material respects identical. The proceedings involve similar questions of law and fact and, therefore, consolidation is appropriate under Commission Rule 103-840.

3. It is in the interest of efficiency and economy of the Commission's and the parties' resources to consolidate the proceedings, and consolidation will help the parties and the Commission to avoid unnecessary costs or delays.

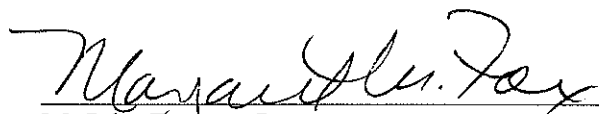
4. Consolidation of the proceedings for hearing will not prejudice the rights of the parties or of the public and will, in fact, serve the public interest by promoting administrative efficiency and economy.

5. The six proceedings are currently scheduled consecutively over a 3-day period beginning at 10:30 a.m. on January 5, 2009. The Applicant's testimony is due on November 24, 2008 in Docket Nos. 2008-325-C and 2008-326-C, on November 25, 2008 in Docket Nos. 2008-327-C and 2008-328-C, and on November 26, 2008 in Docket Nos. 2008-329-C and 2008-330-C. All other parties' testimony, rebuttal, and surrebuttal testimony likewise are scheduled over 3-day periods, depending upon the hearing date. RLECs propose that the earliest of the dates be used for hearing and prefilings of testimony in the consolidated proceeding. In other words, the consolidated hearing would begin at

10:30 a.m. on January 5, 2009; Applicant's testimony would be due on November 24, 2008; all other parties' testimony would be due on December 8, 2008; rebuttal testimony would be due on December 15, 2008; and surrebuttal testimony would be due on December 22, 2008.

WHEREFORE, the RLECs respectfully request that the Commission grant this motion to consolidate the above-captioned proceedings, on the grounds that the proceedings involve similar questions of law or fact, and that consolidation is in the interest of administrative efficiency and economy; approve the hearing and prefiled testimony schedule as proposed herein; and grant such other and further relief as is just and proper.

Respectfully submitted,



M. John Bowen, Jr.
Margaret M. Fox
McNAIR LAW FIRM, P.A.
P O Box 11390
Columbia, SC 29211
Tel: (803) 799-9800
Fax: (803) 753-3219
Email: jbowen@mcnair.net;
pfox@mcnair.net
Attorneys for the RLECS

Columbia, South Carolina

October 22, 2008

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

Docket Nos. 2008-325-C, 2008-326-C, 2008-327-C, 2008-328-C,
2008-329-C, and 2008-330-C

IN RE: Application of Time Warner Cable Information)
 Services (South Carolina), LLC, d/b/a Time)
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 Telephone Services in the Service Area of)
 Farmers Telephone Cooperative, Inc. and for)
 Alternative Regulation)
 (Docket No. 2008-325-C))
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IN RE: Application of Time Warner Cable Information)
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IN RE: Application of Time Warner Cable Information)
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 PBT Telecom, Inc. and for Alternative Regulation)
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IN RE: Application of Time Warner Cable Information)
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IN RE: Application of Time Warner Cable Information)
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 Telephone Services in the Service Area of)
 St. Stephen Telephone Company, Inc. and for)
 Alternative Regulation)
 (Docket No. 2008-330-C))
_____)


CERTIFICATE OF SERVICE

This is to certify that I, ElizaBeth A. Blitch, a paralegal with McNair Law Firm, P. A., have this date served one (1) copy of the Motion to Consolidate in the above-referenced matters to the persons named below by causing said copy to be deposited with the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown on page 3 of this Certificate of Service:

Nanette S. Edwards, Esquire
Jeffrey M. Nelson, Esquire
Office of Regulatory Staff
Post Office Box 11263
Columbia, South Carolina 29211

C. Bradley Hutto, Esquire
Williams & Williams
Post Office Box 1084
Orangeburg, South Carolina 29115

Frank Ellerbe, III, Esquire
Bonnie D. Shealy, Esquire
Robinson, McFadden & Moore, P. C.
Post Office Box 944
Columbia, South Carolina 29202


Elizabeth A. Blitch, Paralegal
McNair Law Firm, P.A.
Post Office Box 11390
Columbia, South Carolina 29211
(803) 799-9800

October 22, 2008

Columbia, South Carolina